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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

DYLAN JOSHUA ROBINSON,)	Case No.: 1:24-cv-00828-KES-BAM
)	
Plaintiff,)	STIPULATION FOR AN EXTENSION OF
)	TIME; PROPOSED ORDER
vs.)	
)	
COMMISSIONER OF SOCIAL SECURITY,)	
)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's motion for summary judgment be extended thirty (30) days from May 9, 2025, up to and including June 9, 2025. This is the parties' second stipulation for an extension of the Court's Scheduling Order, and Defendant's first extension.

This is Defendant's first request for an extension, and it is made with good cause. This case was recently reassigned to undersigned counsel for Defendant. Moreover, counsel already has six other briefs due in approximately the next month, along with other litigation matters, and must take leave to care for a family member the week of May 5, 2025. Thus, Defendant requires

an extension in this case, and may require extensions in other cases, and requests this extension in good faith and with no intent to delay these proceedings unnecessarily.

The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Respectfully submitted,

Dated: April 21, 2025

/s/ Jonathan Omar Pena*

JONATHAN OMAR PENA

Attorney for Plaintiff

**as authorized via e-mail on April 21, 2025*

Dated: April 21, 2025

MICHELE BECKWITH

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By: /s/ Mary Tsai

MARY TSAI

Special Assistant U.S. Attorney

Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation, and cause appearing, Defendant shall have an extension, up to and including June 9, 2025, to respond to Plaintiff's motion for summary judgment. All other deadlines in the Court's Scheduling Order are modified accordingly.

IT IS SO ORDERED.

Dated: April 22, 2025

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE